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March 27, 1985

Mr. David Favero
Hazardous Waste Enforcement Branch
U.S. Environmental Protection
Agency - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Supplement to Comments in Response to EPA's Notice of Proposal to Add Sites to the CERCLA National Priorities List (Proposed October 15, 1984) - Winnebago Reclamation Service Site

Dear Mr. Favero:

On December 14, 1984, we sent to Richard Bartelt on behalf of our client Winnebago Reclamation Service Inc. of Loves Park, Illinois, a copy of the rulemaking comments which were filed with EPA Headquarters on behalf of Winnebago in response to EPA's proposal to include the Winnebago Reclamation Landfill (also known as Pagel's Pit) site on the CERCLA National Priorities List (proposed October 15, 1984). In those rulemaking comments, our client indicated that a further study of the site was then in progress and was being carried out by Warzyn Engineering Inc. of Madison, Wisconsin. The purpose of the study was to gather some additional groundwater data in the immediate vicinity of the Winnebago Reclamation/Pagel's Pit site, and also in the area between that site and the Acme Solvents Superfund site which is located to the east and upgradient of our client's facility.

That additional data-gathering effort has been completed, and a report has been prepared by Warzyn Engineering Inc. reflecting the results. In accordance with our previous commitment, and our recent conversation, I am enclosing two copies herewith, and am also sending a copy to EPA Headquarters for inclusion in the docket.

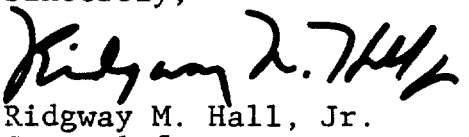
The results of this additional groundwater monitoring provide further evidence that any organic compounds in the vicinity of the Winnebago Reclamation Landfill originated at the Acme Solvents site, and have moved gradually westward with the prevailing groundwater flow towards the landfill. Both the flow patterns and the chemical analyses confirm this.

The results also indicate that at several monitoring wells in the immediate vicinity of the landfill there are some inorganic constituents similar to those found in the samples of leachate taken from inside the liner. Whether this is the result of earlier overtopping or some other source is not presently known. In any event, the concentrations are very low, appear to be confined to the immediate area of the landfill, and thus do not appear to present any exposure risk to any human population or sensitive environmental area. Finally, I enclose a revised draft HRS analysis designed to reflect the latest information at the site.

As I mentioned in our telephone conversation on March 7, Mr. Charles Howard, President of Winnebago Reclamation Service, and I would like to meet with you at your convenience to discuss our comments and the status of the site.

Many thanks for your consideration.

Sincerely,



Ridgway M. Hall, Jr.
Counsel for
Winnebago Reclamation Service Inc.

Enclosures

cc: Mr. Charles J. Howard
EPA Superfund Docket, Washington, D.C.

DRAFT - 3/18/85

Recalculation of HRS Score for Winnebago Reclamation Service Landfill (Pagel's Pit)

1. Observed Release 45

4. Waste Characteristics (based on Arsenic)

Toxicity/Persistence (Sax)	18
Hazardous Waste Quantity (see our Comments, App. J.)	2
Total	= 20

5. Targets

(a) Ground Water Use

Best Case		Worst Case	
1		3	x 3 =
3	or	9	

(b)(1) Distance to Nearest Well 3

(2) Population Served 1 (we believe)

worst case 2

Combined figures for (b) = 8 or 16

Total 5 = 11/17/19/25

6. Multiply 1 x 4 x 5	9,900 /	15,300 /	17,100 /	22,500
7. Divide 6 by 57,330 and multiply at 100	17.27 /	26.69 /	29.83 /	39.25
Final - Line 7 ÷ 1.73 to give HRS Score	9.98	15.43	17.24	22.69

DRAFT - 3/18/85

Notes to Accompany HRS Rescoring of the Winnebago Reclamation Service Landfill (Pagel's Pit) Site on the Basis of an Assumed Observed Release of Arsenic, as Reflected in Supplement Investigation Report Prepared by Warzyn Engineering Inc.

Line 1 - Observed Release

It is not entirely clear whether there has been an actual release from Winnebago Reclamation Service Landfill. However, based on the sampling and analyses reflected in the "Supplemental Investigation" Report on the site prepared by Warzyn Engineering, Project No. C11684 (March 1985), showing concentrations of several inorganic compounds immediately outside the landfill which are also found in samples of leachate inside the liner, this analysis assumes an observed release for purposes of calculating a "worst case" HRS score.

Line 4 - Waste Characteristics

This is based on arsenic, the most toxic of the inorganics found by Warzyn to be present in sampling wells and also present in the leachate samples taken from inside the liner. The hazardous waste quantity of 2 is based upon the recalculation of volume in our rulemaking comments of December 14, 1984, Appendix J.

Line 5 - Targets

In the past, EPA has used, and we have used in our December comments, a 3 for this score on the theory that the aquifer of concern is a potential drinking water supply, is probably used by some houses for drinking water, and no municipal water from alternative unthreatened sources is presently available. This is the "worst case" option. If the facts show that the aquifer in question is not used for drinking water, a value of 1 could be assigned, and this is used as our "best case" alternative. Given the multiplier of 3 for the groundwater use, the best case number is 3 and the worst case is 9.

With respect to Distance to Nearest Well, a 3 is selected based on information that the nearest house which is served by the aquifer of concern is greater than 2,000 feet but less than one mile downgradient from the location of the monitored hazardous substance to the east of the landfill.

With respect to Population Served by the aquifer of concern, we followed closely the text in HRS §3.5 which emphasized that only those who take water from within three miles of the hazardous substance need be counted, and that "people within three miles who do not use water from the aquifer of concern are not to be counted". We assumed, as did EPA in its HRS scoring document, that Kilbuck Creek and the Kishwaukee River provide effective

discontinuities in the aquifer. With the assistance of Warzyn personnel in defining the downgradient flow pattern from the landfill, we identified 56 houses in the potentially affected downgradient area, based upon a physical inspection of the entire area in March, 1985. We do not know whether any of these uses the groundwater as a drinking water supply and, if they do, whether it is the same shallow aquifer as would be potentially affected by any release from the landfill.

Using the "aerial photograph" multiplier of 3.8 residents per house would yield an estimated population of 213, which on the EPA table is in the 101 to 1000 range, for an assigned value of 2. This is a "worst case" estimate, however. The concentrations of the inorganics are extremely low (arsenic never exceeds the drinking water standard) and it is unlikely that they are reaching any of the houses in question. If one assumed an exposed population of 1 to 100, the HRS value for "population served" would be 1.

Using a "value for distance to nearest well" of 3 and a value for population served of 1 produces a combined score for that parameter of 8. If the higher figure is used based on the assumption that people in all 56 houses in the down-gradient area are drinking contaminated water, the assigned value would have to be 2, which would give a combined value on the EPA matrix of 16.

Returning to the Targets part of the score sheet, with a "groundwater use" score, after applying the multiplier of 3, consisting of 3 or 9, and a "distance to nearest well/population served" score of 8 or 16, the following possible scores for item 5 - Targets - appears:

3 + 8 = 11

9 + 8 = 17

3 + 16 = 19

9 + 16 = 25

Final Score

A final hazard ranking score was computed based on the foregoing figures, including each of the four optional Targets scores, and this calculation produced a final HRS score, depending on the Targets score used, of 9.98, 15.43, 17.24, or 22.69.